

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF MISSOURI
Central Division

PATRICK ROMANO, <i>et al.</i> ,)	
individually and on behalf of)	
all others similarly situated,)	
)	
Plaintiffs,)	
)	Case No.: 2:23-cv-04043-BCW
vs.)	
)	JURY TRIAL DEMANDED
TORCH ELECTRONICS, LLC, <i>et al.</i> ,)	
)	
Defendants.)	

PLAINTIFFS' MOTION FOR CLASS CERTIFICATION

Plaintiffs Patrick Romano, Joshua Wilson, Krystal Christensen, Jeffrey Cordaro, Carmen Weaver, Monica McGee, and Mary Bolden move under Rule 23, F.R.Civ.P., for an order:

- (a) certifying plaintiffs' proposed Rule 23(b)(3) class,
- (b) appointing the seven plaintiffs as class representatives,
- (c) appointing attorneys Joe D. Jacobson of Jacobson Press P.C. and Gene J. Brockland and Christopher O. Miller of Amundsen Davis LLC as class counsel, and
- (d) providing for appropriate notice to the class.

The proposed Rule 23(b)(3) class is defined as follows:

All natural persons who deposited money into any electronic gaming device owned or operated by Torch Electronics, LLC, in the State of Missouri and not located on the premises of a Missouri-licensed casino on any one or more days on or after March 3, 2018 and who received back following their play an amount of money less than the amount deposited that day.

The legal bases in support of this motion and a description of a proposed appropriate notice are set out in plaintiff's suggestions in support of the motion filed herewith.

Respectfully submitted

JACOBSON PRESS P.C.

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Christensen, Jeffrey Cordaro, Carmen
Weaver, Monica McGee, and Mary
Bolden

CERTIFICATE OF SERVICE

The filing attorney certifies that on May 5, 2023, the foregoing and all attachments were filed electronically with the Clerk of the Court to be served by operation of the Court's electronic case filing system upon all participants in the Court's electronic case filing system. The attachments are: Bolden Declaration, Brockland Declaration, Christensen Declaration, Cordaro Declaration, Jacobson Declaration, McGee Declaration, Miller Declaration (with exhibits), Romano Declaration, Weaver Declaration, and Wilson Declaration.

The filing attorney further certifies that on that same date paper copies of the foregoing were mailed to defendant Rami Almuttan, 516 Shadow Mountain Ct., Ballwin, MO 63011, by U.S. Mail, first-class postage prepaid.